

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LINDA FAIRSTEIN, )  
                        )  
Plaintiff,           )  
                        ) Case No. 20-cv-8042 (PKC)  
v.                    )  
                        )  
NETFLIX, INC., AVA DUVERNAY, and     )  
ATTICA LOCKE,        )  
                        )  
Defendants.          )

**NOTICE OF DEFENDANTS' MOTION IN LIMINE NO. 1: MOTION TO HAVE JURY  
VIEW SERIES BEFORE OPENING STATEMENTS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Seetha Ramachandran and exhibit thereto, and all prior pleadings in this case, Defendants Netflix, Inc., Ava DuVernay and Attica Locke, by their undersigned attorneys, will move this Court, on a date and time to be determined by the Court, for an order that the jury view *When They See Us* (the “Series”) before opening statements.

PLEASE TAKE FURTHER NOTICE that, in accordance with the briefing schedule set forth in this Court’s October 11, 2023 Order, any opposing papers shall be served and filed by February 16, 2024.

Dated: January 19, 2024

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Respectfully submitted,

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*Attorneys for Defendants Netflix, Inc.,  
Ava DuVernay and Attica Locke*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 19, 2024, a true and correct copy of the foregoing was served by CM/ECF on all counsel or parties of record on the service list.

/s/ Bart H. Williams